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*Lead Counsel for Lead Plaintiff
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[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

ROGER A. IKEDA, Individually and
On Behalf of All Others Similarly
Situating,

Plaintiff,

v.

BAIDU, INC., YANHONG LI, and
CHENG-CHUN YU,

Defendants

Case No. 5:20-CV-2768-LHK-VKD

**NOTICE OF VOLUNTARY DISMISSAL
PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(i)**

CLASS ACTION

Judge: Hon. Lucy H. Koh
Courtroom: 8 – 4th Floor

On April 7, 2021, the Court granted Defendant Baidu Inc.'s Motion to Dismiss with Leave to Amend ("Order"). ECF No. 60. After a careful review of the Order, applicable facts and legal authorities, Lead Plaintiff Robert J. Allustiarti and Lead Counsel Kahn Swick & Foti, LLP hereby give notice pursuant to FED. R. CIV. P. 41(a)(1)(A)(i) that the above-captioned action is voluntarily dismissed, with prejudice and without costs or attorneys' fees to any party, against Defendants Baidu, Inc., Yanhong Li, and Cheng-Chun Yu.

Dated: May 6, 2021

Respectfully submitted,

KAHN SWICK & FOTI, LLP

By: s/ Ramzi Abadou

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-and-

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And the Putative Class*

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses registered, as denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper *via* the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Ramzi Abadou
RAMZI ABADOU

Mailing Information for a Case 5:20-cv-02768-LHK Ikeda v. Baidu, Inc. et al**Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)